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December 22, 2004

VIA HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, NW, Room 3B-443
Washington, D.C. 20554

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DEC 22 2004

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Federal Communications Commission
Office of Secretary

Re: Cox Oklahoma Telcom, L.L.C.
WC Docket No. 01-338
Original Declaration for Reply Comments

Dear Ms. Williams:

I have enclosed the original Declaration of Greg Beveridge (the "Declaration") in support of the Reply Comments of Cox Oklahoma Telcom, L.L.C. ("Cox") in the above-referenced proceeding, which were filed electronically on December 21, 2004. Please associate this document with the Reply Comments, replacing the facsimile copy originally filed as Exhibit 2 thereto.

Please inform me if any questions should arise in connection with this submission.

Respectfully submitted,


Jason E. Rademacher

Counsel to Cox Oklahoma Telcom, L.L.C.

Enclosures

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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DEC 22 2004

In the Matter of

Federal Communications Commission
Office of Secretary

Clarification of the Commission's
Rules and Policies Regarding Unbundled
Access to Incumbent Local Exchange
Carriers' Inside Wire Loop

WC Docket No. 01-338

**DECLARATION OF GREG BEVERIDGE
ON BEHALF OF COX OKLAHOMA TELCOM L.L.C.**

1. My name is Greg Beveridge. I am currently employed as President of Beveridge Consulting, Inc. Beveridge Consulting, Inc. provides consulting services to clients in the telecommunications industry. I have a Bachelor of Science degree from Arizona State University in electronic engineering technology. I have been employed in the telecommunications industry for thirty-six years. I was employed by Mountain Bell/U.S. West (now Qwest Communications) in positions of increasing responsibility from July 1, 1973 until June 1997. I was Chief of Technology for U.S. West International from September 1994 until I left the company in June 1997. Eight patents related to telecommunications have issued in my name and two more are pending. I have been published in a variety of trade magazines related to the telecommunications industry and in IEEE journals. I have also led various industry efforts to establish technical standards in the telecommunications industry.

2. I participated as a testifying expert witness for Cox Oklahoma Telcom, L.L.C. ("Cox") in the matter of the Application of Cox Oklahoma Telcom, L.L.C. for Arbitration of Open Issues Concerning Unbundled Network Elements, Cause No. PUD 200300157, before the Oklahoma Corporation Commission ("PUD 200300157").

3. I am familiar with the proposals of Cox and Southwestern Bell Telephone, L.P. d/b/a SBC-Oklahoma ("SBC") which were the subject of PUD 200300157. I attended the hearing in PUD 200300157. I am familiar with the evidence presented at the hearing, and other matters related to that evidence.

4. I have reviewed and am familiar with the so-called audit conducted by SBC of SBC terminals at multi-tenant environment ("MTE") locations in the Oklahoma City area. This so-called audit is evidenced by in excess of 7,000 photographs that have been annotated by SBC.

5. I have reviewed and am familiar with the listing of SBC "trouble reports" which was introduced in PUD 200300157.

6. Under the supervision of SBC employee Don Rollins I inspected approximately three hundred SBC terminals in the Oklahoma City area at locations where Cox does not offer telephone service.

7. I have reviewed SBC's Opposition to Cox's Petition for Declaratory Ruling in this matter including the Affidavit of William E. Weydeck.

8. Cox has performed tens of thousands of cutovers in the Oklahoma City area where Cox disconnected the SBC inside wire subloop from the SBC network and attached it to Cox's network.

9. The so-called audit conducted by SBC is a comprehensive listing of every single minor imperfection in SBC's network. There is no indication of who caused many of the imperfections shown in the audit, and certainly no indication that many of them were caused by Cox. SBC terminals are usually located outside of apartment buildings. They are accessible to SBC employees, SBC contractors, and many other people, including vandals. Any of these people can pull terminals off walls, remove grommets and plug material, fail to seal terminals, leave wire stubs on binding posts, and cause the other imperfections SBC complains of, and attributes to Cox.

10. Under the supervision of Mr. Don Rollins of SBC, I inspected over three hundred SBC terminals in the Oklahoma City area where Cox does not offer telephone service. The same installation practices and minor imperfections found in SBC's so-called audit are present at SBC terminals where Cox does not offer telephone service.

11. At the SBC terminals I inspected where Cox does not offer telephone service, I found terminals open and unsealed; terminals torn or pried from their mountings on building walls; bare and unprotected wire outside terminals; unprotected splices outside terminals; wire scraps left on binding posts within terminals; wire run through terminal doors, preventing doors from sealing; plug material and grommets removed from terminal openings, allowing moisture and insects to enter the terminals; and other installation practices complained of by SBC. In sum, SBC terminals in locations where Cox does not do business are in substantially the same condition, and exhibit the same imperfect installation practices, as the terminals complained of in SBC's so-called audit.

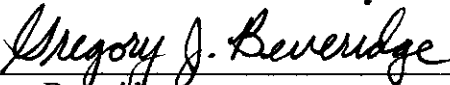
12. There are in excess of three thousand trouble reports summarized in the listing of trouble reports introduced in PUD 200300157. Virtually none of the trouble reports were caused by any error, mistake, or damage from Cox's direct access installation practices. Virtually all reported trouble resulted when SBC won back a customer from Cox, tried to turn on that customer's service remotely from the central office and, because Cox had connected the inside wire subloop to its network, SBC had to dispatch a technician to reconnect the inside wire subloop to the SBC network.

13. Dispatching a technician to reconnect the inside wire subloop to the SBC network is simply the unavoidable result of competition with a facilities-based telephone company like Cox. It is not the result of damage to SBC's network or improper installation practices by Cox. Under all of SBC's own proposals in PUD 200300157, SBC would have to dispatch a technician to reconnect the inside wire subloop to SBC's network every time SBC wins back a customer from Cox.

14. Under Cox's proposal in PUD 200300157, Cox is obligated to notify SBC of every instance in which Cox disconnects an inside wire subloop from SBC's network and reconnects it to Cox's network. While SBC will have to dispatch a technician to reconnect the inside wire subloop if SBC wins back a customer from Cox, under Cox's proposal SBC will have all information necessary to maintain its facilities inventory database, and the ability to provision and maintain service to its customers.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 21, 2004


Greg Beveridge